

# STATE OF ALASKA

**DEPT. OF ENVIRONMENTAL CONSERVATION  
DIVISION OF SPILL PREVENTION AND RESPONSE  
CONTAMINATED SITES PROGRAM**

**FRANK H. MURKOWSKI, GOVERNOR**

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File # 475.38.013

February 27, 2006

Mr. Jerald M. Reichlin  
Fortier & Mikko  
101 West Benson Boulevard  
Suite 304  
Anchorage, Alaska 99503

RE: Environmental Cleanup at Northeast Cape

Dear Mr. Reichlin:

Thank you for your letter sent on January 9, 2006. The department and I understand there is considerable community concern surrounding the environmental contamination at Northeast Cape and that there is particular concern about the habitat in and around the Suqitughneq (Suki) River.

The Northeast Cape project is near the end of the remedial investigation phase of cleanup. The Corps of Engineers (COE) has been working on a Feasibility Study that will help decide the best remedial alternatives to be used to cleanup the soil, sediment and groundwater contamination. After the Feasibility Study is complete the COE will produce a Proposed Plan which is a brief summary document on the history of the site and the intended plan to clean up the site (as determined by the feasibility study). The Proposed Plan is issued for public review. All comments received are responded to and incorporated in the final in a section called the Responsiveness Summary. After the Proposed Plan a Record of Decision (ROD) is produced. The ROD goes into more detail on how the remedy will be implemented.

Cleanup levels will be discussed in the Feasibility Study and Proposed Plan. With the complexity of the Northeast Cape site, it is likely that a combination of default residential and risk based levels will be used.

In regards to the concern expressed in your letter about the biogenic vs. petrogenic components in the sediment of the Suki drainage, our chemist, Earl Crapps, disagrees with Dr. Scudato and Dr. Wang on the chromatogram interpretation. I can send you a detailed analysis of Mr. Crapps interpretation if you wish, but the gist is that the compounds eluting beyond the post one minute Residual Range match the background biogenic signatures. We also feel that no forensic "source identification" or definitive testing is needed for the samples. The source and responsible party are not an issue at this site. The data submitted is sufficient to make a qualitative determination on the nature of the contamination, whether weathered petroleum fuel (diesel) is present or if the results are due primarily to naturally occurring biogenics. The variables in the chromatogram

interpretations as to biogenic or petroleum will likely have little effect on the remedial choices for cleanup because the AK102 concentrations are low even if the totals are considered to be all petroleum.

During our January 25<sup>th</sup> Restoration Advisory Board meeting I briefly discussed the criteria agencies use to help manage contaminated site cleanup decisions. I will reiterate them briefly here to clarify the parts that make up the decision process. The DEC guidance document "Decision Documentation under the Site Cleanup Rules – 18 AAC 75.325 – 390, July 1999", lists five criteria:

Protectiveness – how well does each alternative protect human health, safety and welfare or the environment?

Practicable – are the technologies/techniques under consideration capable of being designed, constructed or implemented in reliable and cost effective manner?

Short and Long-term Effectiveness – are there potential adverse effects during construction or implementation of the alternative? How well does the alternative protect human health, safety, and welfare or the environment after completion of the cleanup?

Regulations – Will the alternative comply with all state and federal regulations?

Public Input – Have comments received from the community regarding each alternative been considered and addressed?

In 2003 a request was made by some interested community members that the Northeast Cape site be included on the EPA superfund list. The EPA reviewed the Northeast Cape file in May 2003 and concluded that there would not be a funding or oversight benefit to the site being included on the list.

The Northeast Cape site is consistently in the top prioritization of sites for the COE and DEC. To date over \$20 million has been spent on the Northeast Cape cleanup. Budget projections are estimated at approximately another \$20 million to complete the remedial action.

If you have any questions regarding this letter, please contact me at 269-3053.

Sincerely,



Jeff Brownlee  
Environmental Specialist

cc: Sivuqaq, Inc.  
Savoonga Native Corporation  
City of Gambell  
City of Savoonga  
Native Village of Gambell  
Native Village of Savoonga  
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